## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

**CASE NO. 10-**06239 **(SEK)** 

MARIA DEL P. FIGUEROA
Debtor

CHAPTER 13

RESPONSE TO DEBTOR'S OBJECTION TO CLAIM #5-1
TO THE HONORABLE COURT:

NOW COMES Scotiabank de Puerto Rico, (Scotibank), through counsel, and most respectfully STATES and PRAYS:

- 1. On or about October 14, 2010, Debtor filed an objection to the claim filed by appearing party.
- 2. In summary Debtor objects \$90.00 worth of inspections plus legal fees for a total amount \$2,500.00.
- 3. Relative to the inspections they were eliminated which resulted in an amendment to claim.
- 4. Relative to the legal fees they correspond to:

  legal fees for bankruptcy case 09-10544

Mallace Tiasques Sanabria
Counselor at Law
17 México Street, Suite D-1
San Juan, Puerto Rico 00917-2202
Phone (787) 756-5730, Fax (787) 764-0340
E-mail: walvaz@prtc.net

Waltace Tiesques Sandria
Counselor at Law
17 México Street, Suite D-1
San Juan, Puerto Rico 00917-2202
Phone (787) 756-5730, Fax (787) 764-034

\$600.00, legal fees relative to this bankruptcy \$650.00, fees relative to filing of foreclosure action as per Exhibit "B" \$761.00 for a total of \$2,011.00 as per claimed.

WHEREFORE it is respectfully requested that this Motion BE GRANTED, and accordingly objection to claim number 5-1 be denied because we have provided sufficient evidence in support of claim, with such further relief as is deemed appropriate under the circumstances.

I CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of this Court via CM/ECF system, which will electronically send notification of such filing to the following to: Mr. Jose M. Prieto Carballo; Mr. Alejandro Oliveras Rivera; and Ms. Monsita Lecaroz Arribas.

In San Juan, Puerto Rico, this \_\_\_\_\_, day of November, 2010.

Wallace Vaxquez Sanabria-125101 17 Mexico St., Suite D-1

San Juan, PR 00917-2202

Tel: 787-756-5730 Fax: 787-764-0340

Email: walvaz@prtc.net